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January 3, 2025

The request to seal is GRANTED. As to the audiovisual materials, the Court would prefer if a courtesy copy of these materials were sent to Chambers via a file-sharing service, rather than via DVD.

The Clerk of Court is directed to terminate the motion at Dkt. 53.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.  
Dated: January 6, 2025

**VIA ECF**

The Honorable Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007

**Re: *Global Weather Productions, LLC v. Reuters News & Media Inc.*, No. 24-cv-507 (AS)**

Dear Judge Subramanian:

We represent Defendants Reuters News & Media Inc. (“RNMI”) and Thomson Reuters U.S. LLC (“TRUSL”) in the above-referenced action. Pursuant to Your Honor’s Individual Practices ¶ 11(B)–(C), we write to request leave to file certain documents under seal and in redacted form. In addition, pursuant to the S.D.N.Y. Electronic Case Filing Rules & Instructions § 5.2, Defendants request leave to file certain audiovisual materials in hard copy on DVD.

Today, Defendants will file a motion for partial summary judgment and preclusion sanctions. In support of their motion, Defendants rely on certain sensitive proprietary information contained in exhibits to the Declaration of Jeremy A. Chase (“Chase Declaration”) that warrants sealing and redaction, including the following:

- Chase Declaration Exhibits 16, 17, and 18: These exhibits are proprietary customer lists of RNMI, and should be sealed in their entirety.
- Chase Declaration Exhibits 1, 2, and 9: These exhibits are RNMI’s contracts with Stringr, Inc. (“Stringr”) and Latin America News Agency (“LANA”). Defendants seek limited redaction of certain financial terms within each agreement.
- Chase Declaration Exhibits 45 and 47: These exhibits are the deposition transcripts of RNMI’s and Stringr’s corporate representatives, respectively. Defendants seek limited redactions of RNMI’s customers and details of its financial arrangements with Stringr, LANA, and its customers.

Notwithstanding the presumption in favor of public access to judicial documents, information may be sealed if countervailing factors overcome the presumption. *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 124 (2d Cir. 2006). Courts have granted motions to seal similar proprietary information, including customer lists and financial terms. *See Lexington Furniture*

*Indus., Inc. v. Lexington Co., AB*, 2021 WL 1143694, at \*2 (S.D.N.Y. Mar. 24, 2021) (sealing exhibits containing “specific, non-public financial statements, sales information and customer lists,” which “could advantage Movants’ competitors and harm their businesses”); *Skyline Steel, LLC v. PilePro, LLC*, 101 F. Supp. 3d 394, 412–13 (S.D.N.Y. 2015) (sealing and redacting “‘highly confidential sales information, including pricing information,’ which is not available to the public”). For the same reasons, the Court should grant leave to seal and redact Defendants’ confidential and proprietary customer lists and financial terms. Were this information made public, it could advantage RNMI’s competitors and harm RNMI’s business including its ability to negotiate future business deals. Unredacted copies of these documents, with the proposed redactions highlighted, will be filed under seal.<sup>1</sup>

In addition, pursuant to Individual Practices ¶ 11(C)(i), Defendants will redact certain information as requested by Plaintiff in the following documents:

- Defendants’ Memorandum of Law and 56.1 Statement;
- Chase Declaration Exhibits 21, 22, 23, 24, 25, 26, 27, 28, 48, and 49.

Finally, for Chase Declaration Exhibits 13, 14, and 15, Defendants will file slipsheets corresponding to audiovisual materials that cannot be filed on ECF. Because these audiovisual materials are relevant to Plaintiff’s claims of copyright infringement of certain videos, Defendants request leave to file these materials in hard copy on DVD, with a courtesy copy submitted to Chambers.

For the foregoing reasons, Defendants respectfully request leave to file the above documents under seal and publicly in redacted form, and the audiovisual materials in hardcopy on DVD. We thank the Court for its attention to this matter.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

/s/ *Jeremy A. Chase*

Jeremy A. Chase

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<sup>1</sup> In their sealed filing, Defendants will file the Chase Declaration annexing *only* the sealed exhibits. Should the Court so desire, Defendants can refile the entire declaration with all exhibits under seal, provide courtesy copies to Chambers, or otherwise assist the Court with receipt of the filing. In addition, pursuant to Individual Practices ¶ 11(A), Defendants will redact certain information from their filings that does not require Court approval, including dates of birth, home addresses, and telephone numbers.